

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA : INFORMATION
:
- v. - : 20 Cr. 510()
:
MICHAEL R. WEIGAND, :
a/k/a "Shabang," :
a/k/a "~Shabang~," :
a/k/a "~s," :
a/k/a "s," :
:
Defendant. :
:
- - - - - X

COUNT ONE

(False Statements to a Federal Agent)

The United States Attorney charges:

The Defendant, Associated Individuals, and the Silk Road Website

1. At all times relevant to this Information, MICHAEL R. WEIGAND, a/k/a "Shabang," a/k/a "~Shabang~," a/k/a "~s", a/k/a "s", the defendant, was a citizen of the United States and a resident of Ohio. WEIGAND is a computer programmer and an electrical engineer.

2. From in or about January 2011, up to and including on or about October 2, 2013, an underground website known as "Silk Road" hosted a sprawling black-market bazaar on the Internet, where illegal drugs and other illicit goods and services were regularly bought and sold by the site's users. During its more than two-and-a-half years in operation, Silk Road was used by

several thousand drug dealers and other unlawful vendors to distribute hundreds of kilograms of illegal drugs and other illicit goods and services to well over one hundred thousand buyers, and to launder hundreds of millions of dollars deriving from these unlawful transactions. On Silk Road, sellers openly advertised and sold (a) illegal narcotics, such as heroin, cocaine, lysergic acid diethylamide (LSD), and methamphetamine; (b) computer-hacking services and software; (c) fraudulent identification documents; (d) money laundering services; and (e) firearms. All transactions on Silk Road were required to be paid with Bitcoin, which facilitated the illegal commerce conducted on the site by, among other things, concealing the identities and locations of the users transmitting and receiving funds through the site.

3. The owner and operator of Silk Road was Ross William Ulbricht, a/k/a "Dread Pirate Roberts," a/k/a "DPR," a/k/a "Silk Road". Ulbricht ran the website with the assistance of various co-conspirators, including Roger Thomas Clark, a/k/a "Variety Jones," a/k/a "VJ," a/k/a "Cimon," a/k/a "Plural of Mongoose," and a small staff, such as customer support staff representatives and several computer programmers.

4. Roger Thomas Clark, a/k/a "Variety Jones," a/k/a "VJ," a/k/a "Cimon," a/k/a "Plural of Mongoose," served as a trusted advisor of Ulbricht. Clark was responsible for, among other

things, promoting sales on Silk Road, hiring and managing a computer programmer, advising Ulbricht regarding Silk Road's rules, and conducting research and collecting intelligence on law enforcement's efforts to investigate Silk Road.

Statutory Allegations

5. On or about January 6 and 7, 2019, in the Southern District of New York, MICHAEL R. WEIGAND, a/k/a "Shabang," a/k/a "~Shabang~," a/k/a "~s", a/k/a "s", the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, willfully and knowingly, falsified, concealed, and covered up by trick, scheme, and device material facts, and did make materially false, fictitious, and fraudulent statements and representations, to wit, after being specifically warned that it is a federal crime to make a false statement to a federal law enforcement officer, WEIGAND falsely told a Special Agent of the Internal Revenue Service and a Special Agent of the Federal Bureau of Investigation, in New York, New York, among other things, that: (1) he never opened an account on the Silk Road website; (2) he never used the online pseudonyms "Shabang" or "~Shabang~"; (3) he never transferred Bitcoin to the Silk Road website; (4) he never exposed computer security vulnerabilities in the Silk Road website; (5) he never communicated with anyone who used the online pseudonym "Dread Pirate Roberts," "DPR," or

"Silk Road"; (6) he never performed any services for the Silk Road website; and (7) the purpose of his trip to London in late 2013, following the takedown of the Silk Road website and arrest of Ross Ulbricht, was to meet with Roger Thomas Clark's associate regarding a marijuana seed business.

(Title 18, United States Code, Section 1001(a).)

/s/
AUDREY STRAUSS
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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v.

MICHAEL R. WEIGAND,
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Defendant.

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(18 U.S.C. §§ 1001(a))

AUDREY STRAUSS
Acting United States Attorney.
